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TE LADIES TRESSES SURVEY REQUIREMENTS (5201) JEE-0370-92

response to your memo of May 7 1992 we have reviewed the "Interim Survey equirements for Spiranthes diluvialis\* as well as memoranda 92 RF 2629 and RF 92-4077 id have the following responses

General EG&G while recognizing that these are draft requirements that may be subject to modification will comply with them to the fullest extent possible during any future Spiranthes survey work

Attachment 2. Part 2c To prevent unreasonable delays to IAG-driven remedial actions or other plant site projects EG&G would like to see the requirements (a) describe what constitutes due diligence and (b) place a limit on the number of surveys that must be performed to establish beyond reasonable doubt the absence of this species from a proposed project site

Attachment 2. Part 3 Existing S C S National Wetland Inventory or 75 U S G S quad maps may be at too large a scale to allow for precision mapping of small discrete Spiranthes occurrences For example existing RFP wetland vegetation maps are drawn at a scale of 1 = 500 which is barely sufficient to resolve many of the small iunsdictional wetland areas in the buffer zone

Cover Letter, page 2, ¶5 EG&G would like to note that the draft Habitat Mitigation Plan for Operable Unit 1 recognizes the need to protect this species from Front Range development impacts and contains provisions for creation of a Spiranthes refuge within the buffer zone

92-RF 2629 The Operable Unit 4 IM/IRA project site does not have a seasonally high water table which is the most consistent site feature for Spiranthes. Although neither the presence or absence of Spiranthes was ever demonstrated on the French Drain site the draft Habitat Mitigation Plan for this project addresses through creation of an onsite refuge the potential loss of this species or its habitat. The SID project site may contain this species but additional surveys (per the interim requirements) are planned in this area for August 1992

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BY. 25 DATE A-0U05-000388 T A Vaeth May 15 1992 92 RF 5411 Page 2

92 RF-4077 EG&G will conduct August surveys (per the interim requirements) at the following locations proposed and alternate landfill site road crossings base of B-1 dam surface water stations SW50 SW51 SW52, SW57 SW58 and SW65 and monitoring stations GS05 GS07 and GS10 For other sites referenced in this letter EG&G stands by the findings of the U S Fish and Wildlife specified expert Dr Dave Bucker of no suitable Spiranthes habitat

If there are any questions or concerns please contact Steve Nesta on X8605 or Richard Flory on X8680

L E. Evered Oirector
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